IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

THE GOODYEAR TIRE & RUBBER)
COMPANY,)
) Case No. 2:20-cv-06347-MHW-EPD
Plaintiff,)
) Judge Michael H. Watson
v.) Magistrate Judge Elizabeth P. Deavers
)
CONAGRA FOODS, INC., et al.,)
)
Defendants.)

JOINT MOTION FOR EXTENSION OF TIME

In accordance with Rule 6.1 of the Local Civil Rules of the United States District Court for the Southern District of Ohio, Plaintiff The Goodyear Tire & Rubber Company and Defendants OSCO Industries, Inc. and R.J. Reynolds Tobacco Holdings, Inc. (collectively, the "Parties"), hereby jointly move for a fourteen (14) day extension of the dates in the briefing schedule set forth in the Court's June 3, 2024 Order (Doc. # 275). The Parties are engaged in settlement negotiations and this extension would allow the Parties to devote their efforts to negotiating a resolution. Accordingly, the Parties request that the Court extend the briefing schedule such that the due date for Plaintiff's response memorandum is extended from July 8, 2024 to July 22, 2024 and the due date for Defendants' reply memorandum is extended from July 15, 2024 to July 29, 2024. This extension is not sought for the purposes of delay, but rather is submitted in good faith.

A proposed Order is being submitted with this Motion.

Respectfully submitted,

/s/ William J Hubbard

William J. Hubbard (0077033)
Trial Attorney
THOMPSON HINE LLP
3900 Key Center
Cleveland, Ohio 44114
216-566-5644
Bill.Hubbard@thompsonhine.com

Jeffrey A. Thaler (admitted *pro hac vice*)
PRETI, FLAHERTY, BELIVEAU &
PACHIOS, LLP
One City Center
P.O. Box 9546
Portland, ME 04112-9546
207-791-3213
jthaler@preti.com

Attorneys for Plaintiff The Goodyear Tire & Rubber Company

/s/Stephen N. Haughey

(per June 27, 2024, email authorization to WJH)

Stephen N. Haughey (0010459) (Trial Counsel)

William D. Hayes (0037240)

Lindsey A. Bryant (0100606)

David W. Walulik (0076079)

FROST BROWN TODD LLP

301 E. Fourth Street, Suite 3300

Cincinnati, Ohio 45202

(513) 651-6800

shaughey@fbtlaw.com

whayes@fbtlaw.com

lbryant@fbtlaw.com

dwalulik@fbtlaw.com

Attorneys for Defendant OSCO Industries, Inc.

/s/Gregory J. DeGulis

(per June 27, 2024, email authorization to WJH)
Gregory J. DeGulis (#0045705)
Megan E. Goedeker (#0099649)
MCMAHON DEGULIS LLP
812 Huron Road, Suite 650
Cleveland, OH 44115
(216) 621-1312
gdegulis@mdllp.net
mgoedeker@mdllp.net
Trial Attorneys for R.J. Reynolds Tobacco
Holdings, Inc.

Stephen R. Berlin
KILPATRICK TOWNSEND & STOCKTON LLP
1001 West Fourth Street
Winston-Salem, NC 27101-2400
(336) 607-7300
SBerlin@KilpatrickTownsend.com

Todd S. Roessler
KILPATRICK TOWNSEND & STOCKTON LLP
4208 Six Forks Road, Suite 1400
Raleigh, NC 27609
(919) 420-1700
TRoessler@KilpatrickTownsend.com

Attorneys for R.J. Reynolds Tobacco Holdings, Inc., Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2024, a copy of the foregoing Joint Motion was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access the filing through the Court's Electronic Case Filing System.

/s/ William J. Hubbard
William J. Hubbard